



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Agency for Toxic Substances
and Disease Registry
Atlanta GA 30333

OCT 02 1991

Mr. Daniel W. McGovern
Regional Administrator
Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

| | |
|--------|---------|
| RA/TRA | 10.8.91 |
| Action | H-1 |
| CC: | A-1 |
| File: | |

Dear Mr. McGovern:

I am writing to request an update on Environmental Protection Agency (EPA) activities in response to recommendations the Agency for Toxic Substances and Disease Registry (ATSDR) made in its Public Health Advisory and follow-up Health Consultation on uranium mining areas on lands of the Navajo Nation.

On November 21, 1990, the Agency for Toxic Substances and Disease Registry (ATSDR) issued a Public Health Advisory for the Navajo-Brown Vandever and Navajo-Desiderio uranium mining areas. The Public Health Advisory was followed by a Health Consultation on June 25, 1991. The Health Consultation was provided by our Regional Representative, William Q. Nelson, to Robert Bornstein, an EPA Region IX On-Scene Coordinator. Copies of both documents accompany this letter.

As you will note, several recommendations (numbers 4-9) in the Public Health Advisory center on collection of needed data; another notes the need to address physical hazards that present a danger to residents and others on site. Specifically, ATSDR recommended the following.

- o Data collection efforts to characterize and determine the extent of radioactive contamination and the possible presence of heavy metals should begin "within the calendar quarter" (which would have been by February 21, 1991). Data collection efforts should include sampling of public and private water supplies, biota, food crops, and livestock. Residents whose wells exceed standards should be supplied with alternate potable water.
- o To begin assessing external radiation exposure, residents should be provided personal radiation dosimeters and radon detection devices during that same time period.
- o If data indicate an imminent radiation health hazard

for residents, then immediate steps should be taken to mitigate that hazard, including dissociation of residents from the site.

- o Remediation of the public health hazard should occur "in the most expeditious manner consistent with Federal and State environmental protection, health, and radiation protection laws and regulations." Appropriate steps should be taken to protect public health during any removal actions (e.g., dust control, site access restrictions, and monitoring of radiation levels). The same criteria should apply to remediating any public health hazard that might result in long-term, chronic exposures.
- o Various open mine areas, pits, and shafts should be made physically safe or have access prevented.

The Health Consultation noted that physical hazards were still present and unrestricted at the site, and recommended that site access should be restricted and a site safety plan should be developed. Further, it recommended that additional air samples for radon should be collected, analyzed, and submitted to ATSDR as soon as time permits.

ATSDR has received the EPA Preliminary Assessment, which contained soil, air, and groundwater sampling data for the areas of concern. These data included uranium, radium, and radon levels obtained from various stations within the sites. In subsequent discussions, ATSDR concurred with EPA's removal action levels for cleanup and protection of human health. As a result of these discussions, several areas of contamination have been remediated to levels acceptable to both ATSDR and EPA.

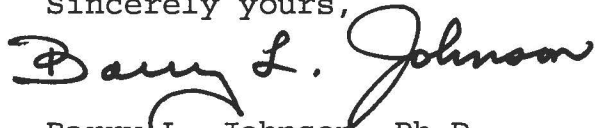
ATSDR now has been informed via telephone by Robert Bornstein that most of the major remediation at these sites has been completed, the exception being the areas where the U.S. Department of Energy is the potentially responsible party. All physical hazards that were of concern to ATSDR have been addressed. This includes filling all pits and trenches and securing or closing all mine shafts. Radiation surveys in areas remediated by EPA indicate that the radiation readings are at levels acceptable to both ATSDR and EPA. Radon measurements in living areas are within the expected limits as compared to background levels in New Mexico; only one measurement exceeded EPA's 4 picocurie per liter action level.

ATSDR is now requesting that we receive a copy of EPA's draft final report in order for our health physics staff to review the environmental levels of radioactivity, the results of the indoor radon surveys, and the results of final composite soil sampling

Page 3 - Mr. Daniel W. McGovern

of these areas. Any other information you can provide on the status of unaddressed recommendations (e.g., biota, food crops, and livestock) would also be welcome. Thank you for your assistance.

Sincerely yours,

A handwritten signature in cursive script that reads "Barry L. Johnson". The signature is written in dark ink and is positioned above the typed name.

Barry L. Johnson, Ph.D.
Assistant Surgeon General
Assistant Administrator

cc:
B. Nelson